FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST 5055
WALT'S WHOLESALE MEATS, INC.
WOODLAND, WA

SUMMARY

Walt's Wholesale Meats is a custom slaughterhouse. They currently have a permit to discharge process wastewater via spray irrigation on-site. Due to regulatory and environmental concerns, Walt's decided to connect to the sewer system, and have their wastewater treated at the Woodland Wastewater Treatment Plant. This new permit allows for the necessary transition period. Walt's will continue to discharge to land while planning and constructing their connection to the sewer. This permit contains monitoring and effluent limits to go into effect upon transition to sewer discharge.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 5055. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to land via spray irrigation to continue for a while. Then, upon completion of the sewer connection to the City of Woodland municipal wastewater treatment plant, Walt's will discharge their lagoon effluent to the sewer. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, the timeline for switching to sewer discharge, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A- Public Involvement Information.

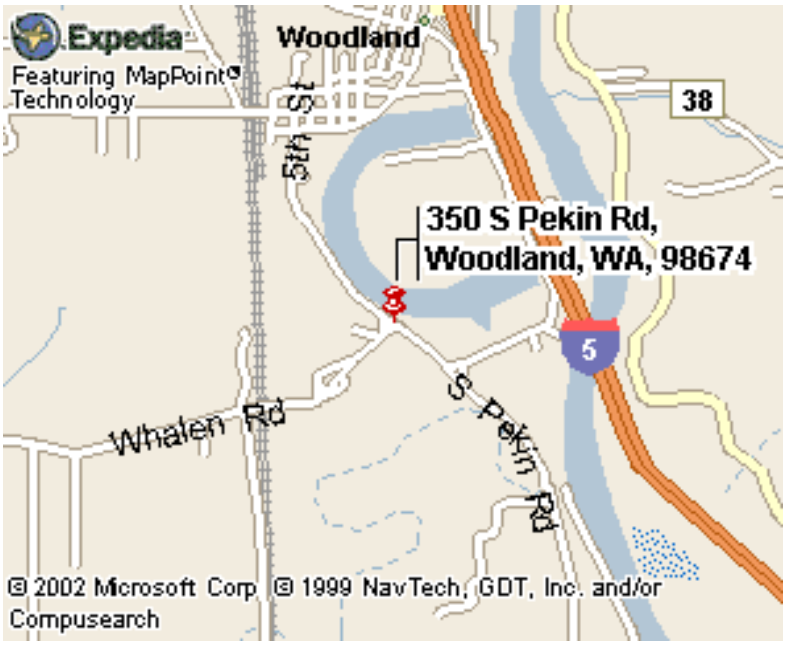
The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D- Response to Comments.

GENERAL INFORMATION	
Applicant	Walt Houser
Facility Name and Address	Walt's Wholesale Meats, Inc. 350 South Pekin Road Woodland, WA 98674
Type of Facility:	Beef Slaughter and Packing
Facility Discharge Location	Latitude: 45° 53' 26" N Longitude: 122□ 44' 29" W
Treatment Plant Receiving Discharge	City of Woodland Wastewater Treatment Plant
Contact at Facility	Jay Houser, Manager 360-225-8203
Responsible Official	Walt Houser, Owner telephone: 360-225-8203 fax: 360-225-6196

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Walt's Wholesale Meats, Inc. (Walt's) is a conventional beef slaughterhouse in Woodland, Washington. The facility is located near the southwest edge of Horseshoe Lake in Cowlitz County.



HISTORY

Walt's has been in operation for about 38 years, with the last 23 years at their current location. The facility has had several upgrades: the lagoon was upgraded from a clay liner to synthetic liner in 1998, and a floating aerator was added; a new drinking and process water well was added about 2000; and Walt's built a new processing building in 2000.

This is the renewal of the permit issued July 14, 1998.

INDUSTRIAL PROCESSES

Walt's is classified under the Standard Industrial Code (SIC) 2011, Meats Packing Plants, Simple Slaugherhouse Subcategory. Federal regulations address these discharges in 40 CFR 432.14, Pretreatment Standards for Existing Sources. This section lists no specific pretreatment limitations other than the general pretreatment standards contained in 40 CFR part 403.

Live cows are delivered to the facility and are held in covered sheds until they can be processed. Wastewater is generated primarily from the butchering process, cleanup of processing rooms and equipment, and wash-down of the holding shed's concrete floor. The processed Meats is either cooled or frozen before shipping.

Walt's production tends to be steady year around, and they anticipate no significant changes to their production rate. A new process building may be built in a few years. Current production rates are about 80-100 cattle slaughtered onsite daily, plus an additional 40-50 carcasses from outside. This production

rate generates about 40,000 pounds of beef out the door per day. Byproducts include 20,000 pounds per day of rendering offal, and 12,000 pounds per day of bone and fat.

TREATMENT PROCESSES

Wastewaters are collected at their sources and routed to the aerated lagoon. In route, the wastewater passes through grease traps and solids separators. The collected grease and solids are removed daily. Walt's enlarged and lined the treatment lagoon in 1998, and added an aerator in 2000. The lagoon is operated as a modified "sequencing batch reactor" (SBR). Wastewater flows to the lagoon as it is generated, where it is aerated and treated via microorganisms. After a period of treatment, the aerator is shut off and the microorganisms and solids settle to the bottom. The supernatant is then pumped to the spray irrigation system and applied to open cropland owned by Walt's. After application, the aerator is turned on again to begin the next cycle.

PERMIT STATUS

The previous permit for this facility was issued on July 14, 1998 and expires after June 30, 2003.

An application for permit renewal was submitted to the Department on August 17, 2001 and accepted by the Department on October 4, 2002. Ecology requested further information about their irrigation management plan from their consultant, which was received November 08, 2002.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on July 26, 2002. Two improvements were noted from the previous inspection of March 7, 2002. The sprinklers were being moved more frequently for shorter sets, and no surface runoff was noted. Also, the truck bed wash station had been relocated to a paved area with a grated drain cover, which now drains directly to the treatment lagoon.

Walt's has not fully complied with their current permit which became effective September 1998. Discharge monitoring reports (DMR's) were not submitted in 1998 or 1999, but have been submitted monthly since then. The reports did not contain all required analytical results until May 2002. Also, the required Ground Water Quality Evaluation, Groundwater Monitoring Well Plan, and Irrigation and Crop Management Plan were not submitted when required.

Walt's current permit allows discharge of treated lagoon effluent to ground via spray irrigation. However, Ecology believes that it would be difficult to write a new permit to allow this discharge to continue. This is based on possible groundwater and surface water impacts, and difficulty proving no impact. At a minimum, in order for Ecology to approve a new land application permit, Walt's would need to do the following:

- Conduct extensive engineering studies of the soil and groundwater on and near the site,
- Conduct studies to demonstrate compliance with ground water quality standards, which would meet the criteria for antidegradation and AKART (all known, available, and reasonable treatment). As an example, disinfection might be necessary to reduce the pathogen load.
- Conduct a detailed crop management/irrigation plan, to establish a discharge application rate that would not exceed agronomic need. Pollutants of concern include BOD, total dissolved solids, ammonia and other nitrogen forms, and coliform bacteria.
- Install an array of groundwater monitoring wells. These wells would be sampled and analyzed periodically far into the future, to check for impacts on groundwater quality.

- If all the studies were conducted and approved, and the monitoring well system installed, then Walt's would need to greatly increase it's current lagoon storage capacity to be able to store wastewater for at least six months of the year, when discharge would not be possible due to saturated soil conditions and/or non-growing season.

- In addition, Walt's would be subjected to enforcement actions due to the multiple violations of the current permit.

Ecology advised Walt's that renewal of the land application permit would be difficult if not impossible, and expensive. Ecology encouraged Walt's to consider switching their discharge to the local sewer, for additional treatment and discharge through the POTW's permitted outfall. Walt's investigated the options and decided to pursue permission to connect the sewer. After petitioning through the City of Woodland, the Board of Cowlitz County Commissioners on July 23, 2002 granted approval for Walt's to connect to the sewer. Ecology will add a compliance schedule in the new permit for Walt's to transition from land application to sewer disposal during the term of the next permit cycle. Discharge to the sewer will provide the highest level of treatment available to Walt's wastewater, and provide the highest level of protection to the environment.

Walt's submitted, via their consultant, a report which recommends certain sprayfield operational parameters to be conducted until the sewer connection is completed (Wheeler Consulting Group Inc. 2002). Ecology reviewed this report and concluded the following (Kimsey, 2002):

- Discharge to ground cannot continue on a long-term basis without groundwater monitoring.
- Year-round application of wastewater to ground should continue no more than one permit cycle without groundwater monitoring and enforceable limits to protect groundwater.
- Summer lawn watering would require the same type of monitoring and limits as year-round discharge.

Based on these reports, the permit for Walt's is not expected to contain language allowing summer lawn watering with effluent after connection to the sewer.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters, from data provided in Walt's application, dated August 2001:

Parameter	Concentration
Flowrate	4700 average, gpd
pH	7.9 standard units
BOD	440 mg/L
Total Dissolved Solids	1500 mg/L
Ammonia	190 mg/L
Nitrate	3.9 mg/L
Total Kjeldahl nitrogen	280 mg/L
Total nitrogen	284 mg/L
Total coliform	>1600 cfu/100 mL

The following table summarizes data submitted in the monthly reports from May 2002 through October 2002:

Parameter	Range
Flowrate, gpd	9000 – 15,400
pH, standard units	7.48 – 8.3
BOD, mg/L	130 - 4112
Total Dissolved Solids, mg/L	4.2 - 3377
Ammonia, dissolved, mg/L	0.21 - 410
Nitrate, dissolved as N, mg/L	0.05 – 0.4
Total Kjeldahl nitrogen, as N, mg/L	21.3 – 960
Total coliform, #cfu/100 mL	<1000 – 24,200

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW. At this time, Ecology believes that solids separation and grease removal followed by an aerated lagoon constitutes AKART for Walt's.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal requirements cover only the general pretreatment requirements in 40 CFR part 403, which are included in all pretreatment permits. Permit limitations necessary to satisfy the requirement for AKART include proper operation of the existing aerated pretreatment lagoon. These limitations will be defined in an engineering report to be submitted prior to construction of the new sewer connection. Walt will enlist the services of an engineering firm to evaluate and propose the best practical operational techniques to maximize treatment and minimize impact on the POTW. After Ecology approves the engineering report, the appropriate requirements from the engineering report will be added to the new permit via permit modification.

Before connecting to the sewer, Walt's will continue to land-apply their wastewater.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Woodland Wastewater Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Woodland and codified in ordinance. In addition to several narrative standards, applicable limits for this discharge include the following:

Parameter	Limit

Temperature	150° F.
Oil & Grease	100 mg/L
pH	5.5 to 9.0 std. units

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED JULY 14, 1998

The July 1998 permit contained no numeric limits, but described many narrative limitations for land application of Walt's effluent. Because the new proposed permit allows the transition from land application to sewer discharge, the interim land application requirements will remain similar to the 1998 permit. However, a compliance schedule will be added to aid the transition. Then, upon the switch to sewer discharge, pretreatment limitations for discharged wastewater will go into effect. The proposed sewer discharge limits are as follows:

Parameter	**Proposed Limits**
pH, standard units	Between 5.5 and 9.0
Oil and Grease	100 mg/L daily maximum

The temperature limit from Woodland's ordinance will not be added, since Walt's discharge will be at roughly ambient temperature, and should never approach a temperature of concern for the POTW.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

Monitoring shall be conducted once per month during land application. This data will be useful to help characterize Walt's discharge and to help the consultant prepare the engineering report for discharge to the sewer. When discharge to the sewer begins, Walt's will sample their discharge twice per month. The monitoring schedule is detailed in the proposed permit under Condition S2, sections A1 and A2. Specified monitoring frequencies take into account the expected quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring. Necessary monitoring will include the permitted parameters (pH and oil and grease) plus biochemical oxygen demand (BOD), total suspended solids (TSS), and ammonia. These parameters are of interest to the POTW and are necessary for process control.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum

potential in terms of pollutant capture and treatment. The manual should include pertinent aspects of the approved engineering report.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under authority of RCW 90.48.080, that the Permittee develop and submit to the Department a solid waste plan to prevent solid waste from causing pollution of waters of the state. The plan must also be submitted to the local solid waste permitting agency for approval. This plan should describe all solid wastes generated at Walt's, how they are handled, who handles the wastes, where they are taken and for what purpose, and what steps are taken to prevent spills of solids and liquids during handling and transport.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW therefore a slug discharge control plan is required (40 CFR 403.8 (f)).

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for 5 years.

REFERENCES FOR TEXT AND APPENDICES

Wheeler Consulting Group, Inc. 2002. *Interim Sprayfield Management Recommendations: Walt's Wholesale Meats Inc., Woodland, Washington*. Wheeler Consulting Group, Inc., PO Box 29586, Bellingham, WA

Kimsey, Melanie. *Walt's Wholesale Meats Technical Memo.* Washington State Department of Ecology, Southwest Regional Office Water Quality Program. November 25, 2002.

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on July 21, 2002 in The Daily News to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on March 22, 2003 in *The Lewis River News* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, 360.407-6286, or by writing to the address listed above.

This permit was written by Don Reif, Environmental Engineer.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater

facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of

various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX D – RESPONSE TO COMMENTS

Comments were received from the City of Woodland (Robert A. VanderZanden letter to Don Reif dated April 15, 2003) and from Wheeler Consulting Group, on behalf of Walt's (email from Ed Wheeler to Don Reif on March 31, 2003).

1. The email from Mr. Wheeler consisted mostly of discussion and description of probable upgrades to Walt's treatment system and training for Walt's employees. In addition, the memo contained one suggested language change to the permit. The majority of paragraph #3 of the memo is included as explanation:

> *...The one suggestion that I might make is to change the verbiage in S1.A.4 to include conditions that refer to a "Settled Sludge Index" rather than a specific time period. Experience has shown us that better effluent conditions may be achieved with a settle period between one and three hours. The combination of microorganisms in this type of industrial wastewater typically will begin to "fluff up" after a period of time and floatation of the mixed liquor can occur. Additionally, after approximately four and a half to five hours of no aeration, a useful portion of the microorganism population begins to fade reducing overall reduction of BOD and TSS.*

Ecology Response: Ecology agrees that this suggested approach will provide more flexibility and makes sense. Effluent quality could be better, especially if sludge floatation due to gas formation is prevented and/or the facultative bacterial population is better preserved. Therefore, the language in the permit will be changed to eliminate the four hour settling requirement and to institute an optimum settling period indicated by the actual settling characteristics of the wastewater on that day. This requirement will go into effect on the effective date of the permit.

2. The letter from the City of Woodland described the City's viewpoint on several issues related to the acceptance of wastewater from Walt's, particularly capacity issues and concerns about the strength of this wastewater stream. The City emphasizes the need for additional analytical testing of effluent and the expected effect of the additional wastestream on the City's treatment plant, or publicly owned treatment works (POTW).

Ecology Response: Ecology agrees with both points. Existing data is rather sparse, and a detailed evaluation of the potential impact of Walt's discharge on the POTW is reasonable. Ecology expects to approach these issues as follows. Additional data will be gathered beginning with the implementation of this new permit. Specifically, the new permit requires monthly testing for parameters to characterize the strength of Walt's effluent. This data will be added to the existing data base and evaluated in the engineering report, to be submitted for review by July 1, 2004. This will allow at least 6-8 months of data to be evaluated. In addition, Ecology conducted a sampling evaluation recently. Those results will be reported in the near future, and will be one more data point for evaluation. In addition, the City of Woodland could make arrangements with Walt's to collect and analyze additional samples.

Ecology will use the required engineering report to assess the suitability of the proposed discharge, with pretreatment, to the POTW. An analysis of the potential impacts of Walt's discharge on the POTW is a required element of the engineering report. WAC 173-240-130(2) describes the elements needed in an engineering report. Item (o) requires *Where discharge is to a municipal sewerage system, a discussion of that system's ability to transport and treat the*

proposed industrial waste discharge without exceeding the municipality's allocated industrial capacity. Also, a discussion on the effects of the proposed industrial discharge on the use or disposal of municipal sludge. Ecology will work with the City of Woodland to assess the potential impact of Walt's effluent and to approve a system that will meet the needs of all parties.